

REMARKS

This paper is responsive to a Non-Final Office action dated March 21, 2007. Claims 1-5, 7-46, and 48-63 were examined.

Claim Rejections Under 35 U.S.C. § 101

Claim 40 stands rejected under 35 U.S.C. § 101 as being directed to non-patentable subject matter. The Office action states that claim 40 is not statutory subject matter because the computer-readable medium may include “electronic,” “wireless or other communications medium,” as described in paragraph 1076 of the specification. The Office action states that as best understood by the Office, the computer-readable medium encoding would include electromagnetic radiation waves, which are naturally occurring phenomenon and non-patentable subject matter. Applicants respectfully maintain that the Office has failed to provide a basis for that conclusion of unpatentability. Applicants respectfully point out that the issue of whether an electrical signal is patentable subject matter under 35 U.S.C. § 101 is an issue in In re Nuijten, No. 06-1301, a case before the U.S. Court of Appeals for the Federal Circuit, which has not been decided to date. Applicants respectfully maintain that under current law, a computer-readable medium encoding an integrated circuit product is an article of manufacture for the purposes of 35 U.S.C. § 101. Accordingly, Applicants respectfully request that the rejection of claim 40 be withdrawn.

Claim Rejections Under 35 U.S.C. § 112

Claims 61-63 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Claim 61 is amended to provide antecedent basis. Applicants believe that amended claim 61 satisfies the requirements of 35 U.S.C. § 112, second paragraph. Accordingly, Applicants respectfully request that the rejection of claims 61 and 62 be withdrawn.

Applicants respectfully maintain that independent claim 63 satisfies the requirements of 35 U.S.C. § 112, second paragraph. Accordingly, Applicants respectfully request that the rejection of claim 63 be withdrawn.

Claim Rejections Under 35 U.S.C. § 102

Claims 1, 2, 7, 8, 18, 21-25, 28, 30, 36-39, 41, 42, 52, 53, and 59 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,847,282 to Gomez et al. (hereinafter, "Gomez"). Regarding claim 1 Applicants respectfully maintain that Gomez, alone or in combination with other references of record, fails to teach or suggest

an electromagnetic shielding structure formed at least partially in one or more redistribution layers formed on an integrated circuit die,

as required by claim 1. Applicants respectfully point out that under 35 U.S.C. § 102, each element of a claim must be found in the single prior art reference, either expressly or inherently. See Minnesota Min. & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc., 976 F.2d 1559, 1565, 24 U.S.P.Q.2d (BNA) 1321, 1326 (Fed. Cir. 1992). If the reference fails to teach even one limitation of a claim, then the claim is not anticipated. See Kloster Speedsteel AB v. Crucible Inc., 848 F.2d 1560, 7 U.S.P.Q.2d (BNA) 1507 (Fed. Cir. 1986). In response to Applicants' arguments, the Examiner points to Figure 13 of Gomez to teach the electromagnetic shielding structure of claim 1. Figure 13 of Gomez teaches "a top view of a side shield 1302 disposed on a surface having a spiral conductive pattern 1304, a first terminal 1306a and a second terminal 1306b. Side shield 1302 does not completely surround pattern 1304 and terminals 1306. Instead, side shield 1302 provides an opening 1310 that enables the coupling of traces (not shown) to terminals 1306." Col. 8, lines 13-19. Nowhere does Figure 13 of Gomez, or any other portion of Gomez, teach or suggest an electromagnetic shielding structure that is formed at least partially in one or more redistribution layers formed on an integrated circuit die, as required by claim 1. Accordingly, Applicants respectfully request that the rejection of claim 1, and all claims dependent thereon, be withdrawn.

Regarding claim 29 Applicants respectfully maintain that Gomez, alone or in combination with other references of record, fails to teach or suggest that

electromagnetically shielding at least one circuit element formed on an integrated circuit die by

substantially surrounding the circuit element with an electrically conductive enclosure formed at least partially in one or more redistribution layers formed on the integrated circuit die,

as required by claim 29. Applicants respectfully point out that under 35 U.S.C. § 102, each element of a claim must be found in the single prior art reference, either expressly or inherently. See Minnesota Min. & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc., 976 F.2d 1559, 1565, 24 U.S.P.Q.2d (BNA) 1321, 1326 (Fed. Cir. 1992). If the reference fails to teach even one limitation of a claim, then the claim is not anticipated. See Kloster Speedsteel AB v. Crucible Inc., 848 F.2d 1560, 7 U.S.P.Q.2d (BNA) 1507 (Fed. Cir. 1986). In response to Applicants' arguments, the Examiner points to Figure 13 of Gomez to teach the electromagnetic shielding structure of claim 29. Figure 13 of Gomez teaches "a top view of a side shield 1302 disposed on a surface having a spiral conductive pattern 1304, a first terminal 1306a and a second terminal 1306b. Side shield 1302 does not completely surround pattern 1304 and terminals 1306. Instead, side shield 1302 provides an opening 1310 that enables the coupling of traces (not shown) to terminals 1306." Col. 8, lines 13-19. Nowhere does Figure 13 of Gomez, or any other portion of Gomez, teach or suggest an electromagnetic shielding structure that is formed at least partially in one or more redistribution layers formed on an integrated circuit die, as required by claim 29. Accordingly, Applicants respectfully request that the rejection of claim 29, and all claims dependent thereon, be withdrawn.

Regarding claim 41 Applicants respectfully maintain that Gomez, alone or in combination with other references of record, fails to teach or suggest that

forming an electromagnetic shielding structure at least partially in one or more redistribution layers formed on an integrated circuit die, the electromagnetic shielding structure substantially surrounding a circuit element,

as required by claim 41. Applicants respectfully point out that under 35 U.S.C. § 102, each element of a claim must be found in the single prior art reference, either expressly or inherently.

See Minnesota Min. & Mfg. Co. v. Johnson & Johnson Orthopaedics, Inc., 976 F.2d 1559, 1565, 24 U.S.P.Q.2d (BNA) 1321, 1326 (Fed. Cir. 1992). If the reference fails to teach even one limitation of a claim, then the claim is not anticipated. See Kloster Speedsteel AB v. Crucible Inc., 848 F.2d 1560, 7 U.S.P.Q.2d (BNA) 1507 (Fed. Cir. 1986). In response to Applicants' arguments, the Examiner points to Figure 13 of Gomez to teach the electromagnetic shielding structure of claim 41. Figure 13 of Gomez teaches "a top view of a side shield 1302 disposed on a surface having a spiral conductive pattern 1304, a first terminal 1306a and a second terminal 1306b. Side shield 1302 does not completely surround pattern 1304 and terminals 1306. Instead, side shield 1302 provides an opening 1310 that enables the coupling of traces (not shown) to terminals 1306." Col. 8, lines 13-19. Nowhere does Figure 13 of Gomez, or any other portion of Gomez, teach or suggest an electromagnetic shielding structure that is formed at least partially in one or more redistribution layers formed on an integrated circuit die, as required by claim 41. Accordingly, Applicants respectfully request that the rejection of claim 41, and all claims dependent thereon, be withdrawn.

Claim Rejections Under 35 U.S.C. § 103

Claims 3-5, 31-33, and 43-46 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gomez in view of U.S. Patent No. 6,790,759 to Wang et al. (hereinafter, "Wang"). Applicants believe that claims 3-4, 31-33, and 43-46 depend from allowable base claims and are allowable for at least this reason.

Regarding claim 5, Applicants respectfully maintain that the Office has failed to establish a *prima facie* case of obviousness. In particular, Applicants respectfully maintain that Gomez, alone or in combination with Wang, fails to teach or suggest

an electromagnetic shielding structure formed at least partially in one or more redistribution layers formed on an integrated circuit die, the electromagnetic shielding structure substantially surrounding a circuit element, the circuit element being formed below a passivation layer of the integrated circuit die,

as required by claim 5. The Office relies on Gomez to teach the electromagnetic shielding structure. As discussed above with regard to claim 1, Gomez fails to teach or suggest an electromagnetic shielding structure formed at least partially in one or more redistribution layers formed on an integrated circuit die. Wang fails to compensate for the shortcomings of Gomez. Wang teaches a device including “a die (53) having a contact pad (61) thereon, a redistribution conductor (59) having a base portion (64) which is in electrical communication with the contact pad (61) and a laterally extending portion (63), a bumped contact (65) which is in electrical communication with the redistribution conductor (59), and a passivation layer (57) disposed between the laterally extending portion (63) of the redistribution conductor (59) and the die (53).” Col. 2, lines 41-49. Nowhere does Wang teach or suggest an electromagnetic shielding structure formed at least partially in one or more redistribution layers formed on an integrated circuit die, as required by claim 5.

Applicants respectfully point out that

[o]ften it will be necessary for a court to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine known elements in the fashion claimed by the patent at issue. To facilitate this review, this analysis should be made explicit.

KSR Int'l Co. v. Teleflex Inc., 82 USPQ2d 1385, 1396 (U.S. 2007) (emphasis added). The Office action fails to provide articulated reasoning with some rational underpinning to support a legal conclusion of obviousness of an electromagnetic shielding structure formed at least partially in one or more redistribution layers formed on an integrated circuit die, the electromagnetic shielding structure substantially surrounding a circuit element, the circuit element is formed below a passivation layer of the integrated circuit die required by claim 5. Accordingly, Applicants respectfully request that the rejection of claim 5 be withdrawn.

Allowable Subject Matter

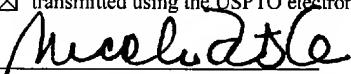
Applicants appreciate the indication of allowable subject matter in claims 9-17, 19, 20, 26-28, 34, 35, 48-51, 54-58, and 60. Applicants believe that claims 9-17, 19, 20, 26-28, 34, 35,

48-51, 54-58, and 60 depend from allowable base claims and are allowable for at least this reason.

Additional Remarks

New claim 64 is added. Applicants believe that new claim 64 depends from an allowable base claim and is allowable for at least this reason.

In summary, all claims are believed to be allowable over the art of record, and a Notice of Allowance to that effect is respectfully solicited. Nonetheless, if any issues remain that could be more efficiently handled by telephone, the Examiner is requested to call the undersigned at the number listed below.

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 Nicole Teitler Cave	<u>6/18/07</u> Date
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Respectfully submitted,



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